

accident is expected to be released during these pump surveillances. The inspections, operating procedures, and surveillances ensure that significant lining releases will be promptly detected and investigated. In addition, SWS design features provide the system with a significant level of protection against degraded lining debris (e.g., standby spare RBCCW heat exchanger and EDG [Emergency Diesel Generator] engine cooler strainers) both during normal operation and while responding to an accident.

An evaluation was performed to assess the significance of loading on the linings due to a postulated seismic event. The importance of seismic loads depends upon their magnitude relative to normal operating loads, and on their relative frequency of occurrence. Normal operating loads include steady state flow loads as well as transients due to pump swaps and realignments for surveillances. The evaluation determined that normal operating loads are significantly greater than anticipated seismic loads concurrent with steady state flow loads. Therefore, if normal operating loads do not cause lining to become detached, it is very unlikely that a random seismic event would cause detachment. In addition, while flow loads are continuously present in most of the system and normal transients occur many times during an operating cycle, seismic events at the Millstone site are very infrequent (the repetition rate of an OBE [Operating Basis Earthquake] is hundred of years). Should normal operating loads cause lining detachment, it is much more probable that this released material will be detected, and the degraded condition corrected, prior to the occurrence of a seismic event.

Based upon these discussions, and given the random nature of lining degradation and the scrutiny with which the SWS is operated and maintained, it is not considered to be credible that the operability of both SWS trains will be simultaneously impaired by lining degradation and release.

Therefore, there is no significant increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

As discussed above, the failure of a single heat exchanger or a single SWS train will not cause an accident. Only a common mode loss of SWS function could create the possibility of a previously unanalyzed accident, and this loss would not directly initiate an accident. However, for the reasons discussed above, lining degradation will not cause common mode failures to occur.

Therefore, the change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in a margin of safety.

The margins of safety of the protective boundaries (fuel matrix/cladding, reactor coolant system pressure boundary, and containment) would not be impacted by the postulated release of lining material into the SWS. The accident analyses in the FSAR [Final Safety Analysis Report] demonstrate the performance of the protective boundaries.

As discussed previously, it is not considered to be credible that lining degradation will cause a common mode loss of SWS function. Therefore, since the accident analyses credit only one SWS train, released lining would not affect accident analyses assumptions. On this basis, it is concluded that margins of safety as demonstrated by the accident analyses would not be affected by postulated lining material release.

Therefore, the change will not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Local Public Document Room location: Learning Resources Center, Three Rivers Community-Technical College, 574 New London Turnpike, Norwich, Connecticut, and the Waterford Library, ATTN: Vince Juliano, 49 Rope Ferry Road, Waterford, Connecticut.

Attorney for licensee: Lillian M. Cuoco, Esq., Senior Nuclear Counsel, Northeast Utilities Service Company, P.O. Box 270, Hartford, Connecticut.
NRC Deputy Director: Phillip F. McKee.

Northeast Nuclear Energy Company, et al., Docket No. 50-336, Millstone Nuclear Power Station, Unit No. 2, New London County, Connecticut

Date of amendment request: July 17, 1998.

Description of amendment request: The proposed amendment would change the Technical Specifications (TS) surveillance requirements for the onsite emergency diesel generators (EDGs) to achieve an overall improvement in the EDGs reliability and availability. The proposed changes would modify the requirement for operability tests of an EDG when the other EDG is inoperable, delete the requirement for operability tests when one or both offsite A.C. sources are inoperable, eliminate fast loading of the EDGs except for the 18-month testing, and eliminate fast starts (15 seconds) except for once per 6 months and during the 18-month testing. These proposed changes are generally consistent with the guidance provided in Generic Letter (GL) 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability," dated July 2, 1984, and GL 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation," dated September 27, 1993. Justification for deviations from the guidance provided

in the GLs is provided in the licensee's submittal.

In addition, the licensee proposes to revise the wording in the TS requirements for offsite circuits to be consistent with NUREG-0212, "Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors," Revision 2, fall 1980, and the guidance provided in GL 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate 24-Month Fuel Cycle," dated April 2, 1991. The associated TS Bases will be updated to reflect the proposed changes.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The LCOs [Limiting Conditions for Operation] for Technical Specifications [TSs] 3.8.1.1 and 3.8.1.2 will be changed to require a transmission network between offsite power and the onsite Class 1E distribution system, instead of just between offsite and the switchyard. This change, which will expand the requirement, is consistent with the current Millstone Unit No. 2 interpretation of the required distribution system. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The diesel generators (DGs) supply power to the emergency busses at Millstone Unit No. 2 in the event of a loss of normal power (LNP). The emergency busses supply the vital equipment used to mitigate the consequences of design basis accidents. Therefore, the diesel generators are vital equipment used to mitigate the consequences of design basis accidents. Failure of the DGs will not cause a design basis accident to occur. However, failure of the DGs will affect the consequences of design basis accidents if a concurrent LNP occurs.

The proposed changes will revise the action requirements regarding operability testing of the DGs. The requirement to test the DGs if offsite circuits are inoperable will be deleted. An inoperable offsite circuit, by itself, will not affect the operability of the DGs. The requirement to test the remaining operable DG if one DG is inoperable will be modified. Testing will not be required provided a common cause failure is not the reason for declaring the DG inoperable. The requirement contained in the first footnote (*) to Technical Specification 3.8.1.1 to complete the test of the remaining DG will be deleted. The need to test the remaining DG will be based on the determination of a common cause failure. These changes will improve DG reliability by reducing the number of unnecessary starts and by requiring more appropriate testing of the DGs when there is a potential for common mode

failure. The proposed changes to the action requirements will not change the response of the DGs to an LNP. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The requirement contained in the second footnote (**) to Technical Specification 3.8.1.1 to allow a one time extension of the allowed outage time to 7 days will be deleted. This provision is no longer necessary since the Millstone Unit No. 1 work has been completed. The statements that a successful test of the DG performed for the current Action Statements c, d, or e will satisfy the required testing of Action States a or b are no longer necessary with the proposed changes. These statements will be deleted. The removal of these items will not change the response of the DGs to an LNP. Therefore, these proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The proposed changes to the DG surveillance requirements will allow an engine prelube period before all DG tests starts, allow slow starting of the DGs, and allow the DGs to be loaded in accordance with manufacturer recommendations. This will decrease the wear on the DGs. The proposed changes will also allow adequate time for the completion of all manufacturer recommended DG engine prelube procedures. Modifying starting and loading requirements, consistent with the manufacturer recommendations, is intended to enhance diesel reliability by minimizing severe test conditions which can lead to premature failures. In addition, specifying that the 184 day DG SRs [surveillance requirements] will satisfy the 31 day DG starting and loading SRs will eliminate redundant testing. These proposed changes will minimize unnecessary DG testing while maintaining DG reliability. The proposed changes will not change the response of the DGs to an LNP. Therefore, these changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The ASTM [American Society for Testing and Materials] standards referenced for diesel fuel oil sampling will be modified in SR 4.8.1.1.2.b. The proposed changes will replace an outdated standard, and will remove the year of issuance or revision from the ASTM standards referenced. This will allow use of the current approved ASTM standard. These proposed changes do not affect the sampling frequency or acceptance criteria of this SR. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The proposed wording changes to eliminate any possible confusion when SRs 4.8.1.1.1 and 4.8.1.1.2 are referenced by SR 4.8.1.2, to state that the DGs start from standby conditions instead of ambient conditions, and to remove the requirement to perform a DG surveillance only during shutdown will not affect any technical aspect of the SRs. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

SRs will be added to test the DGs every 184 days at conditions similar to the current 31 day SRs. These conditions are more restrictive than the new proposed 31 day SRs. The 184 day SRs will require the diesel generators to start and obtain speed and voltage within 15 seconds and will also require the diesel generators to be synchronized, loaded, and to maintain the load for at least 60 minutes. However, it will allow gradual loading, based on manufacturer recommendations, to be used. A 184 day surveillance interval is sufficient to verify DG fast-start capability, and is consistent with GL [Generic Letter] 84-15, GL 93-05, and NUREG-1432. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The list of SRs, contained in SR 4.8.1.2, that do not have to be performed for the operable diesel generator in Modes 5 and 6 will be expanded to take into account the 184 day DG SR that will be added. This proposed change will exclude the one operable DG from being loaded when the 184 day SR is performed. This is consistent with the current SR which excludes performance of SR 4.8.1.1.2.a.3. Loading the one required operable diesel generator could subject this diesel generator to grid faults which could adversely affect its ability to perform its safety function. Therefore, the proposed change will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The Bases of these Technical Specifications will be modified and expanded to discuss the proposed changes, and to provide guidance to ensure the requirements are correctly applied. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

These proposed changes do not alter the way any structure, system, or component functions. The intent of the proposed changes is to improve the reliability of the DGs by eliminating unnecessary surveillance testing and allowing most of the surveillance testing to be performed in accordance with the recommendations of the manufacturer. There will be no adverse effect on equipment important to safety. The response of the DGs to an LNP, as described in the Millstone Unit No. 2 FSAR [Final Safety Analysis Report], will remain the same. There will be no effect on any of the design basis accidents previously evaluated. Therefore, this License Amendment Request will not result in a significant increase in the probability or consequences of an accident previously analyzed.

2. Create the possibility of a new or different kind of an accident from any accident previously evaluated.

The proposed changes do not alter the plant configuration (no new or different type of equipment will be installed) or require any new or unusual operator actions. They do not alter the way any structure, system, or component functions and do not alter the manner in which the plant is operated. The proposed changes do not introduce any new failure modes. Therefore, the proposed

changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in the margin of safety.

This License Amendment Request proposes to modify the LCOs for electrical power sources, DG surveillance requirements and the required actions for inoperable electrical power sources contained in the Millstone Unit No. 2 Technical Specifications. The proposed changes will revise LCO wording to be consistent with the required offsite power distribution requirements and improve DG reliability by minimizing excessive wear of the DGs, and changing the starting and loading requirements of the DGs, in accordance with manufacturer recommendations, during most DG surveillance and operability tests. Improving the reliability of the DGs will help ensure the DGs will respond to an LNP as described in the Millstone Unit No. 2 FSAR. Therefore, this License Amendment Request will not result in a significant reduction in the margin of safety as defined in the Bases for the Technical Specifications addressed by the proposed changes.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Local Public Document Room
location: Learning Resources Center, Three Rivers Community-Technical College, 574 New London Turnpike, Norwich, Connecticut, and the Waterford Library, ATTN: Vince Juliano, 49 Rope Ferry Road, Waterford, Connecticut.

Attorney for licensee: Lillian M. Cuoco, Esq., Senior Nuclear Counsel, Northeast Utilities Service Company, P.O. Box 270, Hartford, Connecticut.

NRC Deputy Director: Phillip F. McKee.

Northeast Nuclear Energy Company, et al., Docket No. 50-336, Millstone Nuclear Power Station, Unit No. 2, New London County, Connecticut

Date of amendment request: July 21, 1998.

Description of amendment request:
The proposed amendment would change the Technical Specifications (TS) by changing various Reactor Protection System (RPS) and Engineered Safety Features Actuation System (ESFAS) setpoints and allowable values; correct the specified maximum reactor power level limited by the high power level RPS trip; add new TS and requirements associated with the automatic isolation of steam generator blowdown; and make several editorial and changes to correct various errors